

KENNETH W. SALINGER
617.239.0561
ksalinger@palmerdodge.com

June 4, 2003

By E-mail and Messenger

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

Re: DTE 01-20 – Verizon's Motion to Delay Compliance Filing

Dear Ms. Cottrell:

AT&T respectfully urges the Department to deny Verizon's motion to modify the procedural schedule for its compliance filing.

In its order dated May 29, 2003, the Department has ordered Verizon to make very specific corrections to its original, preliminary compliance filing. Verizon is not permitted to change anything else. It should not be a difficult exercise for Verizon to make those changes. Indeed, there is no reason whatsoever that Verizon should not have already re-run its cost models, and be in the process of preparing the supporting documentation and making the accompanying tariff revisions for filing on Thursday, June 5, 2003.

Verizon argues that even after re-running its models it still has substantial work to do to revise its illustrative tariff and to revise the Compliance Tracking Matrix that explains precisely how it implemented the specific changes mandated by the Department. Even if that were true, that would not provide any reason for delaying Verizon's filing and service of its revised UNE recurring and non-recurring charges in accord with the May 29 order.

If the Department wishes to give Verizon some extra time to complete all of the tariff pages and other documentation that are part of this compliance filing, it should not delay the filing of the revised UNE rates. Rather, if any changes are to be made, AT&T urges that they be as follows:

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| June 5 by 5:00 p.m.: | Verizon files a complete listing of the revised recurring and non-recurring charges, in the form of revised versions of Book 1, Tab 2 and Book 2, Part A, of the February 2003 compliance filing. |
| June 6 by noon: | Verizon delivers to the Department and to all local parties electronic copies of its revised cost studies. |

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| June 9 by 5:00 p.m.: | Verizon submits remainder of compliance filing in electronic form, including the Compliance Tracking Matrix and the illustrative tariff. |
| June 12 by 5:00 p.m.: | Verizon submits entire revised compliance filing in paper form to Department, and delivers it to local parties or overnights it to other parties. |
| June 16 by 5:00 p.m.: | Any comments on revised compliance filing must be filed with the Department and served on all parties. |
| June 19 by 5:00 p.m.: | Verizon's reply comments must be filed with the Department and served on all parties. |

Any additional delay beyond that contemplated in this alternative proposal would needlessly delay CLEC business plans, and would unfairly give Verizon a free marketing window before CLECs can make and implement business decisions based on final UNE rates.

Prior to filing this opposition, we spoke with Verizon's counsel in attempt to reach agreement on a middle ground schedule. Verizon was unwilling to agree to provide even a summary of revised UNE rates prior to June 9.

We thank the Department for its prompt attention.

Very truly yours,

Kenneth W. Salinger

pc: Service list (by e-mail and regular mail)